

EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

SDN LIMITED and STEVEN NERAYOFF,

Plaintiffs,

v.

IOV LABS LIMITED, RIF LABS LIMITED, RSK
LABS LIMITED, DIEGO GUTIERREZ ZALDIVAR,
and ALEJANDRO MARIA ABERG COBO a/k/a ALEX
COBO,

Defendants.

Index No. _____

**SUMMONS WITH
NOTICE**

PLAINTIFFS DESIGNATE
NASSAU COUNTY AS THE
PLACE OF TRIAL

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to appear in this action by serving a notice of appearance on Plaintiffs’ attorneys within twenty (20) days after the service of this summons, exclusive of the day of service, or within thirty (30) days after the service is complete if the summons is not personally delivered to you within the State of New York.

Venue is properly before this Court pursuant to CPLR § 503(a) because Plaintiff Nerayoff resides in this County. Nassau County is designated as the place of trial. Jurisdiction over Defendants, and each of them, is proper pursuant to CPLR §§ 301 and 302 because Defendants (1) transacted business within the state or contracted anywhere to supply goods or services in the state; (2) committed tortious acts within the state; and (3) committed tortious acts without the state causing injury within the state.

TAKE NOTICE THAT this is an action for fraud, aiding-and-abetting fraud, and rescission based upon Defendants’ conduct in connection with the unregistered offering and sale of RIF tokens. To induce Plaintiffs to purchase Defendants’ RIF tokens, Defendants made numerous knowing misrepresentations of material fact, as well as material omissions, that

Plaintiffs justifiably relied upon to their detriment in making their investments. More particularly, at meetings with Plaintiffs, both within and outside of New York, Defendants falsely represented that Defendants' RIF blockchain was a second-layer blockchain solution that would provide Ethereum-style smart contract capabilities and other functionality to the Bitcoin blockchain. At the time Defendants made these representations, upon which Plaintiffs reasonably relied, Defendants knew that the RIF blockchain had no such functionality, no such functionality had ever been developed, and that they had no plans for such functionality. Following the launch of the RIF blockchain, Defendants' fraud was revealed and the value of Plaintiffs' investments declined over 99%. Plaintiffs seek the rescission of their investments and the return of their invested Bitcoin or, in the alternative, monetary damages at the date of judgment in an amount not less than \$100 million, plus interest thereon.

TAKE FURTHER NOTICE THAT in case of your failure to appear, judgment will be sought and may be taken against you in the form of a rescission award or, in the alternative, in an amount of monetary damages at the date of judgment not less than \$100 million, plus interest, and the costs and disbursements of this action as the Court may award.

Dated: New York, New York
May 3, 2024

LOEB & LOEB LLP

By: /s/ John A. Piskora
John A. Piskora (jpiskora@loeb.com)
David A. Forrest (dforrest@loeb.com)
345 Park Avenue
New York, NY 10154
Tel: (212) 407-4000

Attorneys for Plaintiffs SDN Limited and Steven Nerayoff

To: IOV LABS LIMITED
Suite 23 Portland House
Glacis Road
Gibraltar GX11 1AA

RIF LABS LIMITED
Suite 23 Portland House
Glacis Road
Gibraltar GX11 1AA

RSK LABS LIMITED
BVI 1895440
Morgan & Morgan Building
Pasea Estate
Road Town, Tortola
British Virgin Islands

DIEGO GUTIERREZ ZALDIVAR
2028 4 R Vidt
Buenos Aires C1425
Argentina

ALEJANDRO MARIA ABERG COBO a/k/a Alex Cobo
600 Grapetree Drive, Apt. 10GN
Key Biscayne, FL 33149-2707

Camino De Los Horneros 220
Lomas De La Tahoma Lote 346
14000 Colonia Nicolich
Canelones Uruguay